

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

----- X
ALISSA FREDRICKS,

Plaintiff,

Civil Action
No. 19-10331-RGS

v.

MARKEL CATCO INVESTMENT
MANAGEMENT LTD AND MARKEL CORP.,

: **ORAL ARGUMENT
REQUESTED**

Defendants.

:

----- X
DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT

Pursuant to Federal Rule of Civil Procedure 12(b)(6) and on the basis of *forum non conveniens*, defendants Markel CATCo Investment Management Ltd and Markel Corp. (collectively, "Defendants") hereby move this Court to dismiss Plaintiff's Amended Complaint (ECF No. 13) with prejudice. The grounds for this Motion are set forth in the accompanying memorandum of law, Declaration of Alexander Potts QC, Appendix of Foreign Authorities, and Transmittal Declaration of James R. Carroll and its enclosed exhibit, which are submitted herewith.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(D), Defendants respectfully request oral argument on this Motion.

LOCAL RULE 7.1 CERTIFICATION

I, Christopher A. Lisy, hereby certify that I have conferred with counsel for Plaintiff in good faith, but the parties have been unable to resolve or narrow the issues presented in this Motion.

Dated: April 29, 2019

/s/ Christopher A. Lisy
Christopher A. Lisy

Dated: April 29, 2019
Boston, Massachusetts

Respectfully submitted,

/s/ James R. Carroll
James R. Carroll (BBO #554426)
Christopher A. Lisy (BBO #662283)
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
500 Boylston Street
Boston, Massachusetts 02116
(617) 573-4800
james.carroll@skadden.com
christopher.lisy@skadden.com

David E. Schwartz (*pro hac vice* forthcoming)
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Four Times Square
New York, New York 10036
(212) 735-3000
david.schwartz@skadden.com

Counsel for Defendants
Markel CATCo Investment Management Ltd and
Markel Corporation